

Filing # 40946339 E-Filed 05/02/2016 11:36:15 AM

IN THE CIRCUIT COURT OF THE
THIRTEENTH JUDICIAL CIRCUIT IN
AND FOR HILLSBOROUGH COUNTY
FLORIDA

DENNIS ERWIN, Individually and as
Executor of the Estate of SUSAN ERWIN,
deceased,

CASE NO.: 16-CA-002032

Plaintiff,

v.

FORD MOTOR COMPANY and
ALBERT MCCLINTON, individually

Defendants.

NOTICE OF DROPPING PARTY, ALBERT MCCLINTON, WITH PREJUDICE

COMES NOW the Plaintiff, Dennis Erwin, as Personal Representative for the Estate of Susan Erwin, by and through their undersigned attorneys, and, pursuant to Fla. R. Civ. P. 1.250(b), drops Defendant, Albert McClinton, as a party to this action with prejudice.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2ND day of May 2016, I filed the foregoing with the court by means of ECF and served upon the opposing counsel by email service pursuant to Fla. R. Jud. Admin. 2.516 with the email addresses filed with the court as follows:

FOR DEFENDANT ALBERT MCCLINTON

djb@kubickidraper.com

FOR DEFENDANT FORD MOTOR COMPANY

fmcdonald@mtwlegal.com

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ErwinvFord@mtwlegal.com

e.service@mtwlegal.com

EXHIBIT

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/s/ Raymond O. Bodiford

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COUNSEL FOR PLAINTIFF

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY

DENNIS ERWIN, Individually and as
Executor of the Estate of SUSAN ERWIN,
deceased,

CASE NO.: 16-CA-002032

Plaintiffs,

vs.

FORD MOTOR COMPANY and
ALBERT MCCLINTON, individually,

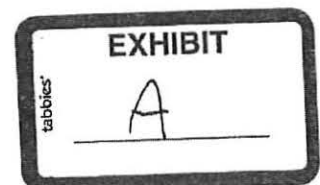
Defendant.

AFFIDAVIT OF ELIZABETH DWYER IN SUPPORT OF DEFENDANT FORD
MOTOR COMPANY'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

I, Elizabeth Dwyer, declare as follows:

1. My name is Elizabeth Dwyer. I am over the age of 18, have personal knowledge of the matters set forth in this affidavit, unless otherwise stated, and if called as a witness, I would be competent to testify to the matters in this affidavit. The facts stated in this declaration are true and correct.

2. I am employed by Ford Motor Company ("Ford") in the Retail Network and Consumer Experience Development department of the Marketing Sales and Service Division. My job title is Retail Network Operations Manager. My responsibilities involve ensuring franchising policies and procedures are adhered to for all Ford and Lincoln franchising actions in the United States and maintaining contractual records for all active franchised Ford and Lincoln dealers. By virtue of my position, I am familiar with Ford's United States business operations, its relationship with the dealerships that sell Ford cars and trucks, and the location of Ford's manufacturing facilities. I am also familiar with the records that Ford keeps on the vehicles it builds.



3. Ford is in the business of designing and manufacturing new cars and trucks.

4. Ford was incorporated in the state of Delaware, and its principal place of business is in Dearborn, Michigan.

5. The vehicle described in Plaintiffs' Complaint on file with the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida in the matter of *Dennis Erwin, Individually and as Executor of the Estate of Susan Erwin, deceased v. Ford Motor Company; and Albert McClinton*, Civil Action No. 2016-CA-002032, is a 2010 Ford Edge vehicle with vehicle identification number 2FMDK3JC2ABA19053. According to Ford's Vehicle Information Report, that particular vehicle was assembled at Ford's Oakville Assembly manufacturing plant in Oakville, Ontario, Canada on July 27, 2009. *See* Ford's Vehicle Information Report attached hereto as Exhibit 1. Those same records, along with Ford's Factory Invoice, reflect that the vehicle was sold on August 11, 2009 to an independent Ford dealership in Watsonville, CA. *See e.g.* Ford's Factory Invoice attached hereto as Exhibit 2. The vehicle was subsequently shipped to National Car Rental in Hebron, Kentucky. *See* Exhibit 2. Vehicle records also indicate that historical owners of the Edge included various Enterprise Rent A Cars located in Saint Louis, Missouri and Cincinnati, Ohio. *See* Ford's VIN FSA Details attached hereto as Exhibit 3. Thereafter, Susan Erwin was noted to be the owner of the vehicle in Powell, Ohio. *See* Exhibit 3.

6. Ford does not have any assembly or manufacturing plants in Florida.

7. The vehicle described in Plaintiff's Complaint was not originally sold by Ford in Florida. The vehicle entered Florida without Ford's involvement.

8. The vehicle described in Plaintiff's Complaint was not designed in Florida.

10. Ford does not directly engage in servicing of Ford vehicles in Florida. Those activities are conducted exclusively by independent dealers (or third parties), none of whom is a corporate affiliate of Ford. Moreover, the vehicle records provide that the subject vehicle was never serviced in Florida by any independent Ford dealership. See Warranty and Non-Warranty records attached hereto as Exhibit 4.


11. Upon appointment of each dealership, the owner and operator must agree to the standard provisions of the Ford Sales and Service Agreement. Each Ford Sales and Service Agreement refers to Ford Motor Company as the "Company," and includes the following paragraph:

DEALER NOT AGENT OF THE COMPANY

14. This agreement does not in any way create the relationship of principal and agent between the Company and the Dealer and under no circumstances shall the Dealer be considered to be an agent of the Company. The Dealer shall not act or attempt to act, or represent himself, directly or by implication, as agent of the Company or in any manner assume or create any obligation on behalf of or in the name of the Company.

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct.

Executed this 1st day of April 2016, at Dearborn, Michigan.


Elizabeth Dwyer

STATE OF MICHIGAN
COUNTY OF WAYNE

Sworn to and subscribed before me this 1st day of April, 2016, by Elizabeth Dwyer,
who is personally known to me or who produced Ford ID Badge as
identification.

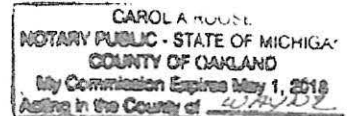
Carol A. Roose

Notary Public

Printed Name: CAROL A. ROOSE

Commission No: info

My Commission Expires: May 1, 2018



Vehicle Information Report

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Server: AWS Prod
Claims loaded through: 17-MAR-2016

Vehicle Information Report

GENERAL VEHICLE INFORMATION: (Related Claims) (QLS Concerns) (Lincoln PDI)

VIN:	2FMDK3JC2ABA19053	Vehicle Line WERS:	T/Q1 - FORD EDGE/LINCOLN MKX [07-15]	Engine:	T/N5 - 3.5L 4V DOHC VCT SM
Model Year:	2010	Vehicle Line AWS:	Q1 - FORD EDGE	Global Engine:	E2273 - CYCLONE GAS V6 (TI
Vehicle Type:	T	Vehicle Line Global:	Q1 - EDGE (NA-OAKVILLE)	Engine Plant:	EN22 - LIMA
Inv. Dealer:	88164	Drive Code:	T/A - 2 WHL LH FRONT DRIVE	Transmission:	T/WJ - 6 SPD AUTO TRANS 6F
Vehicle Status Code:	800	Body Cab Style:	T/WD - 4 DOOR WAGON	Global Trans:	A1104 - AT - 6F50/55 - VDP
Market Derived:	F - FORD	Version/Series:	T/EF - FORD SERIES	Trans Plant:	AT11 - A/T VAN DYKE

BUILD INFORMATION: (Window Sticker) (MVP Info)

Region Built:	NA - NORTH AMERICA	Assembly Plant:	AS - OAKVILLE PLANT BUILD	Vehicle Load Date:	31-JUL-2009
Country Built:	CAN - CANADA	Production Date:	27-JUL-2009	Vehicle Maintenance Date:	30-JUN-2012

SALE INFORMATION:

Region Sold:	NA - NORTH AMERICA	Arrival Date:	01-AUG-2009	Red Carpet Lease:	*
Country Sold:	USA - UNITED STATES	Sale Date:	11-AUG-2009	Fleet/Retail/Co. Lease:	F
Vehicle Count Flag:	Y	Warranty Start Date:	11-AUG-2009	Modified Vehicle:	*
Selling Dealer St/Prov:	CA	Original WSD:	11-AUG-2009	Warranty Status Ind:	*
Selling Dealer [code]:	MID BAY FORD LINCOLN [172729 - *]	Vehicle Export Flag:		Vehicle Export Flag:	N

VOC:

-----1-----2-----3-----4-----5-----6-----7-----8-----9-----0-----1-----2-----3-----4-----5-----6-----

K3JABA19053111 2 T 9E25YF04R AF F J1E C2R G3K21 R F729725R52VADI B 2W DC2YH02C5 2 A200A CJKY 80H16ER001

EOC:

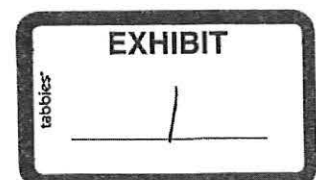
-----1-----2-----3-----4-----5-----6-----7-----8-----9-----0-----1-----2-----3-----4-----5-----6-----

INSTALLED OPTION INFORMATION:

Air Conditioning:	T-B - MANUAL AIR CONDITIONER	Color(Trim):	000DW - CHARCOAL BLACK	Navis Engine Serial #:	09L113100249
Alternator Amp Rating:	*	Delivery Type:	4	Paint:	PN3HW - DARK INK BLUE
Audio Disk:		Driveshaft Code:	*	Power Antenna:	* - [N/A]

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Axis Ratio:	EGADD - 3.16 FINAL DRIVE RATIO	Front Seat:	T/B - SEAT-INDIVIDUAL-L/R DRV/PASS	Radio:	MJ - AM/FM STRO/CD CHANGE
Axis Type:	* - [N/A]	Fuel Type:	AF - UNLEADED FUEL CAPABILITY	Sound System:	AA - LESS UPGRADED SOUND S
Battery Amp Rating:	MU	Fuel Type Engine:	G - Gas	Tire Manufacturer:	A1 - MICHELIN
Brake Code:	FBAAN - BRAKE DISCS 17"	GVW Class Code:	D	Tire Brand:	4ARAYX - *
Brake Code(Service):	* - [N/A]	Instrumentation:	* - [N/A]	Tire Size:	D3HC2 - P245/60R18 A/S BSW H-I
Calibration Code:	%Q11FW% A	Mirror(Driver Side):	CG - DRIVER POWER W/O PUDDLE LAMP	Traction Control:	AC - IVD TRACTION BRAKES
Color(Accent):	* - [N/A]	Mirror(Psng Side):	CG - PASS POWER W/O PUDDLE LAMP		

WERS INFORMATION:

148 rows: (hide)

Family Code	Feature Code	Family Description	Full Description
000	DW	ALL INT TRIM COLORS-	CHARCOAL BLACK
4F4	DW	Q1 -B-C -MILLIKEN METRO	
A1P	AB	FRONT DOOR SIL. PROTECTION	FRT DOOR SCUFF PLATE
A51	AB	FLOOR MATS-RIGHT SIDE/FRT&RR I	FLR MATS-RT SD/FRT&RR CARPETED
A52	AB	FLOOR MATS-LEFT SIDE/FRT&RR I	FLR MATS-LFT SD/FRT&RR CARPET
A5M	AB	STAR RATING PERF LEVEL	STAR RATING PERF LEVEL 1
A7B	AG	TAILGATE APPLIQUES	TAILGATE APPLIQUE-PAINTED
A7F	AA	LIFTGATE/DECKLID	LESS LIFTGATE/DECKLID
AA5	AT	LIGHT TRUCK WHEELBASES	111.2"/2825MM WHEELBASE
AAA	QB	VERSION-MFC	HIGH VERSION
AAC	AA	VERSION PACKAGES	LESS VERSION PACKAGES
AAG	AS	PLANT BUILD REQUIREMENTS	OAKVILLE PLANT BUILD
AAM	AB	CONVENIENCE GROUP	CONVENIENCE GROUP
AAZ	DQ	GVWS	5340 LB. GVW
AB5	AV	SALES BADGE	SEL SALES BADGE
ABJ	AA	FUNCTIONAL UPGRADE PACK	LESS FUNCTIONAL UPGRADE PACK
ABT	AA	AMBIENT TEMP/SPEED PACK	LESS AMBIENT TEMP/SPEED PACK
AC	B	AIR CONDITIONER	MANUAL AIR CONDITIONER
ACY	AA	MEMORY PACKAGE	LESS MEMORY PACKAGE
AD2	AB	FEATURE CONTENT GROUP	FEATURE CONTENT GROUP 1
AD6	HA	PROTOTYPE PROGRAM CONTROL	2010 JOB #1 PROGRAM CONTROL
ADP	AA	LUXURY PACKAGE	LESS LUXURY PACKAGE
ADW	AB	GROUP MARKETS	GROUP MARKET #1
AEA	AE	LABELS-SPECIAL LANGUAGE	ENGLISH LANGUAGE LABEL
AED	AB	OWNER HAND BOOK PACK	OWNER HAND BOOK PACK
B2B	AA	WINDOWS/ROOF PNL. AUTO CLOSING	LESS WINDOW/RF PNL. AUTO CLOSE
B2C	AJ	WINDOWS-FRONT SIDE	PWR FRT WDO-I TCH UP/DWN-DRV

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B2G	AE	WINDOWS-TINT	PRIVACY GLASS
B5V	AV	CONSOLE-OVERHEAD	OVERHEAD CONSOLE NON-RAIL
BAY	AA	FLOOR MAT KIT	LESS FLOOR MAT KIT
BBB	AE	INTERIOR CLADDING SURFACE	INTERIOR TRIM ACCENT PACK A
BBP	AA	I/P APPLIQUE-PASSENGER SIDE	LESS I/P APPLIQUE-PASS SIDE
BBQ	AF	I/P INSERT	I/P INSERT-METALLIC FINISH
BCA	AE	SUNVISORS-DRIVER	SUNVISOR,SINGLE-DRV ILLUM
BCB	AE	SUNVISORS-PASS E	SUNVISOR,SINGLE-PASS ILLUM
BCF	AJ	DOOR HANDLES-INSIDE	DOOR HANDLES-INSIDE CHROME
BCM	AE	DOOR TRIM PANEL-DRIVER & PASS	DOOR TRIM PANEL-LEVEL 4
BDS	AA	CARGO STOW RACK	LESS CARGO STOWAGE RACK/RAIL
BLD	AB	GRILLE-FRONT	CHROME GRILLE
BLG	AA	MOLDINGS-GRILLE	LESS GRILLE MOLDING
BLW	AB	ROOF SPOILER	ROOF SPOILER
BLY	AA	ROOF RACK	LESS ROOF RACK
BMD	AB	MLDGS-EXT ROCKER PANEL	ROCKER PANEL MOLDING-BLACK
BML	AE	MOLDINGS-EXTERIOR LOWER	LOWER B/S MLDG
BMR	AD	MOLDINGS-GREENHOUSE DLO	BLACK GREENHOUSE DLO MOLDING
BSB	AG	MIRROR-INTERIOR REAR VIEW	ELECTROCHROMIC MIRROR W/COMPAS
BSD	CG	MIRROR-EXTERIOR DRIVER	DRIVER POWER W/O PUDDLE LMP
BSF	CG	MIRROR-EXTERIOR PASSENGER	PASS POWER W/O PUDDLE LAMP
BUX	AA	FOLD FLAT FRONT PASS SEAT	LESS FOLD FLAT FRONT PASS SEAT
BWC	AK	SEAT-REAR FOLD DOWN	RR SEAT-60/40 SPLIT-FOLDING
BY1	AA	SEAT-TEMP CONTROLLED DRIVER	LESS TEMP CONTROL DRIVER SEAT
BY2	AA	SEAT-TEMP CONTROLLED PASSENGER	LESS TEMP CONTROL PASSNGR SEAT
BY3	AA	SEAT-HEATED REAR	LESS REAR HEATED SEAT
BYB	AM	SECOND ROW SEATING	SECOND ROW 60/40 (3 P)-FOLDING
BYP	AC	SEAT ADJUSTER-DRIVER	POWER 6-WAY DRIVER SEAT ADJUST
BYQ	AB	SEAT ADJUSTER-PASSENGER	MANUAL 2-WAY PASS SEAT ADJUST
C1C	AA	TRAILER TOWING	LESS TRAILER TOWING PACKAGE
CA	WD	ALL VANS	4 DOOR WAGON
CAA	AC	DOOR HANDLE-EXTERIOR	EXT DOOR HANDLE-BODY COLOR
CAE	AB	GEARSHIFT KNOB	LEATHER GEAR SHIFT KNOB
CBF	AE	DOOR ENTRY REMOTE CNTR UNIT	ILLUMINATED DOOR ENTRY KEYPAD
CBG	AD	KEYLESS ENTRY/START SYSTEM	KEYLESS ENTRY-KEY FOB
CHA	AA	ROOF-OPENING PANELS	LESS ROOF OPENING PANELS
CLF	A6	BUMPER-FRONT	FRT BMP-STEP A-GLOSS ACCENT CO
CLM	BA	BUMPER-REAR	REAR BMPR-BODY CONTRAST COLOUR
CLV	AA	LICENSE PLATE BRACKET-FRONT	LESS FRONT LICENSE PLATE BRKT
CN2			

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	AF	RESTRAINT DEVICE PACKAGES	BLT W/D&P FRNT/1&2 ROW RSTRNT
D17	AU	WHEEL-SPARE	SPARE WHEEL-17 MINI STEEL
D2U	LR	WHEEL SIZE/STYLE-18 INCH	18X7.5" PAINTED ALUMINUM WHEEL
D3H	C2	TIRES-18 INCH	P245/60R18 A/S BSW H-RATED
D3M	IJ	TIRE SPARE	SP TIR-T165/80D17
DEB	AA	HEATER-ENGINE	LESS IMMERSION HEATER
DGA	AB	EMISSION REQUIREMENTS-MFC	49 STATE/NON GREEN STATE REQ
DR	A	HVY TRUCK	2 WHL L/H FRONT DRIVE
EGA	DD	FINAL DRIVE RATIO-SINGLE SPEED	3.16 FINAL DRIVE RATIO
EN	N5	HP/RPM/TRQ	3.5L 4V DOHC VCT SMPI V6 GAS
F5B	AC	EXHAUST PIPE EXTENSION	CHROME EXHAUST EXTENSION
FBA	AN	BRAKE TYPE	BRAKE DISCS 17"
FEF	AC	BRAKES-ANTI SPIN TRACTION	IVD TRACTION BRAKES
FF1	AB	ASSEMBLY PLANT FUEL FILL	NORMAL FUEL FILL
FHF	AA	CARGO SHADE-FIA	LESS CARGO SHADE-FIA
FHH	AA	FUEL KIT	LESS FUEL KIT
FHV	AA	ILLUM FNT DOOR SCUFF PLATE-FIA	LESS ILLUM FNT DR SCUF PLT-FIA
FHW	AA	CARGO PACKAGE - FIA	LESS CARGO PACKAGE - FIA
FI2	AA	DVD PACK-FIA	LESS DVD PACK-FIA
FI5	AA	RR BUMPER PROTECTOR APPL-FIA	LESS RR BMPR PROT APPL-FIA
FIQ	AA	CARGO TRAY-FIA	LESS CARGO TRAY-FIA
FIV	AA	REMOTE STARTER-FIA	LESS REMOTE STARTER-FIA
FS	B	SEAT	SEAT-INDIVIDUAL-L/B DRV/PASS
G1F	AA	AIR FILTER PURIFIER	LESS AIR INTAKE FILTER
GBT	AB	FUEL TANK LOCK	NON LOCKING FUEL CAP
GBV	AF	ENGINE FUEL CAPABILITY	UNLEADED FUEL CAPABILITY
GTA	BV	STEERING WHEELS	STRG WHL-LEATHER WRAPPED+CK
HCF	AD	INSTRUM. CLUSTERS	INSTRUMENTATION CLUSTER-YELLOW
HDH	AB	SPEEDOMETERS	MPH/KPH SPEEDOMETER
HIC	AB	TIRE INFLATION MONITOR	TIRE INFLATION MONITOR
HJF	AB	DISPLAYS-COMPASS	COMPASS DISPLAY
HKD	AD	MESSAGE CENTER	VEHICLE COMMUNICATION SYSTEM
HLH	AB	PROXIMITY SENSOR	REVERSE PROXIMITY SENSOR*DSN A
HNA	AA	SECURITY SYSTEMS	LESS ANTI-THEFT SYSTEM
HTA	AB	BATTERIES	STANDARD DUTY BATTERY
IBA	MJ	RADIOS	AM/FM STRO/CD CHANGER/CLK
IBB	AB	RADIO RECEPTION EQUIPMENT	SATELLITE RADIO RECEPT-AUDIO
IBC	AB	RADIO PRE-EQUIPMENT PACKAGE	RADIO PRE-EQUIPMENT PACK-I
IBM	AB	RADIO FREQUENCY	NAAO RADIO FREQUENCY

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	AB	A/V JACK	A/V JACK
IDA	AA	SOUND SYSTEM	LESS UPGRADED SOUND SYSTEM
IDB	AC	RADIO SPEAKERS	4 RADIO SPEAKERS
IEV	AA	MEDIA GATEWAY MODULE (MGM)	LESS MEDIA GATEWAY MODULE
IGB	AB	RADIO CONTROLS-STRG WHEEL	STRG WHEEL RADIO CONTROLS
IGD	AA	GARAGE DOOR OPENER	LESS GARAGE DOOR OPENER
JSX	AA	COMFORT PACK	LESS COMFORT PACK
JBI	AB	AUTO HEADLAMPS-FOLLOW ME HOME	AUTO HEADLAMPS-FOLLOW ME HOME
JBB	AB	HEADLAMPS-DESIGN	HALOGEN HEADLAMPS
JBC	AA	HEADLAMPS-RUNNING	LESS DAYTIME RUNNING LAMPS
JBK	AB	FOG LAMPS-FRONT	FRONT FOG LAMPS
JCB	AA	INTERIOR LIGHT GROUP	LESS INTERIOR LIGHT GROUP
JDA	AB	TAILLAMPS	TAILLAMPS-LEVEL 1
MD	F	MARKET DERIVATIVE	FORD DIVISION DERIVATIVE
PN3	HW	2003/04/05/06/07/08/09 EXT COL	DARK INK BLUE
SAT	AB	GENERIC COUNTRY GROUPINGS	GENERIC COUNTRY GROUP 1
SBR	AA	SPECIAL BUILD REQUIREMENTS	LESS SPECIAL BUILD REQUIREMENT
SE	EF	CARGO HEAVY TRUCK	FORD SERIES
TR	WJ	TRANS	6 SPD AUTO TRANS 6F
VL	Q1	VEHICLE LINE	FORD EDGE/LINCOLN MKX
WAN	AB	NORTH AMERICA PRINCIPLE TERR	USA
XAF	AB	EXC EXPORT(GVT/MILITARY) UNITS	EXC GVMT SERVICE ADMIN
XAN	AC	EXCEPT N.AMERICA PRIN TERR	EXCEPT CANADA
XAS	AC	EXCEPT S.AMERICA PRIN TERRS	EXCEPT BRAZIL
XAT	AB	EXCEPT US TERRITORIES	EXCEPT GUAM
XSA	AA	EXCEPT AFRICAN TERRITORIES	EXCEPT BAHRAIN
XSC	AC	EXCEPT CENTRAL AMERICA TERR'S	EXCEPT COSTA RICA
XSE	AY	EXCEPT EUROPEAN SECONDARY TERR	EXCEPT ALBANIA
XSI	AA	EXCEPT CARIBBEAN ISLAND TERR'S	EXCEPT ANTIGUA
XSP	AK	EXCEPT ASIAN-PACIFIC SECDRY TR	EXCEPT ISRAEL
XSS	AB	EXCEPT S.AMERICA SECDRY TERR	EXCEPT ARUBA
YBC	MB	MARKETING BODY CODE	MRKTG BODY CODE-K3J
YLA	AA	MRKTG REGIONAL PKGS 1	LESS MRKTG REGIONAL PKGS 1
YPI	AA	CARGO PACKAGE	LESS CARGO PACKAGE
YPE	AA	VALUE PACKAGES	LESS VALUE PACKAGE
YPI	ZZ	APPEARANCE PACKAGES	NO POS SEL FROM THIS FAMILY
YPN	ZZ	AUDIO PACKAGE	NO POS SEL FROM THIS FAMILY
YPU	ZZ	COMFORT PACKAGE	NO POS SEL FROM THIS FAMILY
YQS	ZZ	SMOKERS PACKAGE - MARKETING	NO POS SEL FROM THIS FAMILY
YQZ			

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	ZZ	INTERIOR PACKAGE	NO POS SEL FROM THIS FAMILY
YQF	ZZ	ELITE PACKAGE	NO POS SEL FROM THIS FAMILY
YZB	BA	TPO/ORDER CODES 0-300	TPO/ORDER CODE 200A
YZK	AB	FLEET	FLEET

TRACEABILITY INFORMATION:

(Inde)

Trace Commodity	Trace Full Number
DA - DRIVER AIRBAG	DR0907150566
DS - DRIVER SIDE AIRBAG	MRL0907160140
EN - ENGINE	F1600 170709L1131002499G 224 BA
FT - FUEL TANK	U387BA071709211335
LF - LEFT FRONT TIRE	B94ARAYX2109
LR - LEFT REAR TIRE	B94ARAYX2109
PA - PASSENGER AIRBAG	SPA0907080505
PS - PASSENGER SIDE AIRBAG	MRR0907130274
RF - RIGHT FRONT TIRE	B94ARAYX2109
RR - RIGHT REAR TIRE	B94ARAYX2109
SR - SATELLITE RADIO	SAT 031900283431
ST - SPARE TIRE	UYJM ABC1809HBF1U
TR - TRANSMISSION	A4921 1707099198061056AASP 7000 FA 56

TIRE DOT INFORMATION:

LF:	B94ARAYX2109	RF:	B94ARAYX2109
LR:	B94ARAYX2109	RR:	B94ARAYX2109
LI:	*	RE:	*
SPARE:	UYJM_ABC1809	DOT Plant Manufacturer:	B9 - MICHELIN NORTH AMERICA, INC. LEXINGTON, SOUTH CAROLINA

ESP INFORMATION:

ESP Code:
ESP Coverage(Miles):
ESP Coverage(Time):
ESP Plan Year:
ESP Signature Date:

EMISSIONS INFORMATION:

* Emission Code:
* Emission Cert Type:
* Emission Decal Suffix:
* Engine Family:

DGAAB - 49 STATE/NON GREEN STATE REQ.
F
TBY
AFAIXT0352EB - 2010 3.5L EDGE MKX

Any comments? You can contact

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IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named in the documents.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour deposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de deposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de deposer vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Hillsborough County Courthouse, 800 E. Twiggs St., Room 604, Tampa, Florida 33602, (813) 272-7040, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

Florida Rules of Civil Procedure Form 1.902(a), Summons (06/10)

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIRCUIT CIVIL DIVISION

Dennis Erwin, Indiv.; Dennis Erwin,
As Executor of Estate of Susan Erwin
Plaintiff(s)

Case No.: **16-CA-002032**

vs

Ford Motor Company; Albert Mcclinton
Defendant(s)

Division F

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant(s)

Albert Mcclinton
4346 Huddleston Drive
Wesley Chapel, FL 33545-5234

Each defendant is required to serve written defenses to the complaint or petition on **RAYMOND O BODIFORD**, plaintiff's attorney, whose address is **BODIFORD LAW GROUP 121 S ORANGE AVE STE 1150 ORLANDO FL 32801** within 20¹ days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on March 14, 2016.

Attorney: **RAYMOND O BODIFORD**

Attorney For: **Dennis Erwin**

Address: **BODIFORD LAW GROUP**

121 S ORANGE AVE STE 1150

ORLANDO FL 32801

Florida Bar No: **327840**

PAT FRANK

As Clerk of the Court





Dana Caranante, Deputy Clerk

Prepared By: Kim Dietz, Deputy Clerk

P.O. Box 989

800 E Twiggs St

Tampa, FL 33601

Room 101

Tampa FL 33602

(813)276-8100 extension 4365

¹ Except when suit is brought pursuant to section 768.28, Florida Statutes, if the State of Florida, one of its agencies, or one of its officials or employees sued in his or her official capacity is a defendant, the time to be inserted as to it is 40 days. When suit is brought pursuant to section 768.28, Florida Statutes, the time to be inserted is 30 days.

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

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Covered by United States Patent Nos. 7,113,853; 7,778,841; 7,596,512; 8,600,823; 8,595,079; 8,606,648; 7,505,838.

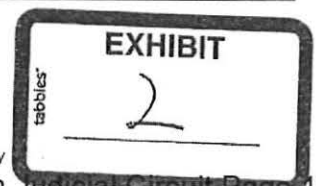
3/22/16 12:32:07 PM (EDT)

DEALER 72W 729		VIN	2FMDK3JC2ABA19053
	Suggested Retail Price	Invoice Amount	
K3JT EDGE FWD-SEL 200A	29920.00	27868.00	
SPECIAL DEALER ACCOUNT ADJUSTM		1203.00-	
2010 MODEL YEAR			
DI DARK INK BLUE METALLIC			
2W BLACK CLOTH			
INCLUDED ON THIS VEHICLE			
.RAPID SPEC 200A			
OPTIONAL EQUIPMENT			
64R .18" PAINTED ALUM SPORT WHEELS			
99C .3.5L V6 ENGINE	NC	NC	
44J .AUTOMATIC OVERDRIVE TRANS	NC	NC	
TC2 .P245/60R18 BSW TIRES			
TOTAL OPTIONS	.00	.00	
TOTAL VEHICLE & OPTIONS	29920.00	26665.00	
DESTINATION & DELIVERY	775.00	775.00	
TOTAL FOR VEHICLE 30695.00			
05 U.S. GAL FUEL CHARGE 13.35			
LONG TERM FLT. INCENTIVE (56K)		1500.00-	
56K - POTENTIALLY ELIGIBLE			
FOR LONG TERM RENTAL			
NET INVOICE FLEET OPTION (B4A)		7.00	
FLEET P.O. NUMBER 38082216			
SHIPPING WEIGHT 3944 LBS.			
TOTAL	30695.00	25960.35	

This invoice may not reflect the final cost of the vehicle in view of the possibility of future rebates, allowances, discounts and incentive awards from Ford Motor Company to the dealer.

Sold to					
Marty Franich Ford/Enterprise 72W729 550 Auto Center Drive Watsonville CA 95076		Order Type 9Z	Ramp Code CQ59	Batch ID 9G161	Price Level 020
Ship to (if other than above)		Date Inv. Prepared	Item Number	Transit Days	
National Car Rental - Erl88648 3230 Loomis Road Hebron KY 41048		07 16 09	72-F04R	12	
		Ship Through			
Invoice & Unit Identification NO. 2FMDK3JC2ABA19053	Final Assembly Point OAKVILLE	Finance Company and/or Bank Ford Motor Credit 000001			

Total Holdback	Invoice Total	A & Z Plan	D Plan	X Plan
	25960.35			



This invoice to be used for the billing of vehicles only

Dealer's copy

VIN FSA Details

* Confidential *

VIN: 2FMDK3JC2ABA19053
 FSA Status: Launched
 Brand: FORD
 Manufacturing Country: CAN

FSA Details

00015673	FUEL TANK SEAM LEAKS
----------	----------------------

Vehicle Details

Model Year:	2010	Assembly Plant:	OAKVILLE PLANT BUILD
Vehicle Line:	FORD EDGE/LINCOLN MKX	Production Date:	27-Jul-2009
Body Style Description:	4 DOOR WAGON	Warranty Start Date:	11-Aug-2009
Vehicle Type Description:	TRUCK	Sale Date:	11-Aug-2009
VDM Vehicle Status:	800	Engine Tag Code:	9G224BA
Emissions:			

Vehicle Conditions

Code	Vehicle Condition	Begin Date	End Date	Source

Owner Details**Current Owner**

Business Name:
 Owner Name: SUSAN ERWIN
 Address 1: 6715 RIVERSIDE DR
 Address 2:
 Address 3:
 Address 4:
 City: POWELL
 State/Province: Ohio Phone #:
 ZIP/Postal Code: 43065 7078 E-Mail:
 Country: UNITED STATES

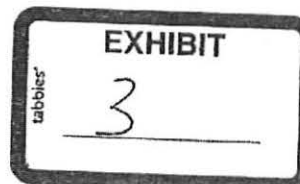
Owner Effective Date: 09-Dec-2013 Vendor Applied Date: 18-Dec-2013
 Vendor Match Code Description: 4-NEITHER NAME OR ADDRESS MATC

N&A Source: POLK GCamp Applied Date: 21-Oct-2015
 Mail Status: Active Mail Suppression Date:

Fleet Code: Fleet Name:
 Fleet Status: Fleet Mgmt Code: -
 Company Car:

Historical Owner

Business Name: ENTERPRISE RENT-A-CAR 7CB515



VIN FSA Details

Page 2 of 4

Owner Name:			
Address 1:	3700 PARK 42 DR STE 100A		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	09-Apr-2010	Vendor Applied Date:	09-Apr-2010
Vendor Match Code	-		
Description:			
N&A Source:	WASFLEET	GCamp Applied Date:	16-Apr-2010
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:		Fleet Name:	
Fleet Status:		Fleet Mgmt:	-
Company Car:			
Historical Owner			
Business Name:	ENTERPRISE RENT-A-CAR 7CB515		
Owner Name:			
Address 1:	3700 PARK 42 DR STE 100A		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	09-Apr-2010	Vendor Applied Date:	09-Apr-2010
Vendor Match Code	-		
Description:			
N&A Source:	FLEET	GCamp Applied Date:	09-Apr-2010
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:	EL001	Fleet Name:	ENTERPRISE RENT-A-CAR
Fleet Status:	Y	Fleet Mgmt:	9999-ENTERPRISE RENT-A-CAR
Company Car:	NO		
Historical Owner			
Business Name:	ENTERPRISE RENT A CAR 7CB515		
Owner Name:			
Address 1:	3670 PARK 42 DR		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	

Country:	UNITED STATES		
Owner Effective Date:	14-Aug-2009	Vendor Applied Date:	14-Aug-2009
Vendor Match Code Description:	-		
N&A Source:	FLEET	GCamp Applied Date:	14-Aug-2009
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:	EL001	Fleet Name:	ENTERPRISE RENT-A-CAR
Fleet Status:	Y	Fleet Mgmt:	9999-ENTERPRISE RENT-A-CAR
Company Car:	NO		
Original Owner			
Business Name:	ENTERPRISE RENT A CAR		
Owner Name:			
Address 1:	600 CORPORATE PARK DR		
Address 2:			
Address 3:			
Address 4:			
City:	SAINT LOUIS		
State/Province:	Missouri	Phone #:	3145122256
ZIP/Postal Code:	63105	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	11-Aug-2009	Vendor Applied Date:	11-Aug-2009
N&A Source:	NAVIS	GCamp Applied Date:	27-Feb-2013
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:		Fleet Name:	
Fleet Status:		Fleet Mgmt Code:	-
Company Car:			

	P&A Code	GEO Sales	Sales Code	Sub Code	Description
Ordering	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.
Ship-To	43666	USA	F88648		EAN Holdings - Cincinnati
Stocking	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.
Selling	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.
FSA Details					
VIN: 2FMDK3JC2ABA19053					
Local FSA: 15S31 - FUEL TANK CORROSION INSPECTION AND REPAIR			Global FSA: 00015673		

Hub: FORD NORTH AMERICA Country: UNITED STATES	
Segment / VIN Group(s):	Supplement Code:
+ 0 - TARGETING SEGMENT - ZZ - CORROSION STATES VIN FROM IHS + 98 - SSSC SEG 98 - TW - 2WD EDGE + 99 - NHTSA SEGMENT - ZZ - CORROSION STATES VIN FROM IHS	00- Original

P&A Code 04227	GEO Sales USA	Responsible Dealer Sales Code F47146	Sub Code	Description Germain Ford
------------------------------	-------------------------	--	-----------------	------------------------------------

Eligibility Indicators		
Type	Indicator	Updated
Repair Eligibility	Y	23-Oct-2015
Display Eligibility	Y	27-Oct-2015
Original Mail Eligibility	N	24-Nov-2015
Follow up Mail	Y	24-Nov-2015

VIN/FSA Vehicle Condition				
Code	Vehicle Condition	Begin Date	End Date	Source

Description	Release Date
RELEASED TO APPROPRIATE SOURCE - ORIGINA	24-Nov-2015

Repair							
Status	System Date	Repair Date	Country	Dealer Code	Claim #	Option/Labor Code	Cost Source

VIN/FSA Vehicle Status		
Description	Reason	Date
OPEN - LAUNCHED	Open	27-Oct-2015
Confirmed		23-Oct-2015

VIN FSA Mail History	
Local FSA:15S31-FUEL TANK CORROSION INSPECTIO...	Global FSA:00015673
Release:	OWNER LETTER
Release Date:	24-Nov-2015
Mail Date:	18-Dec-2015 to 18-Dec-2015
Restricted Address:	No
Address:	ERWIN,SUSAN 6715 RIVERSIDE DR POWELL,OH 43065 7078,UNITED STATES
Resp. Dealer:	04227USAF47146-
Fleet Acct:	
Fleet Mgmt Loc:	
N&A Source:	POLK
Owner Effective Date:	09-Dec-2013
Note:	

FSA Counts			
FSA Category	Repair Eligible (Open)	Repair Ineligible (Closed)	Total
SAFETY RECALL	1	0	1
Total	1	0	1

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VIN FSA Details

* Confidential *

VIN: 2FMDK3JC2ABA19053
 FSA Status: Closed
 Brand: FORD
 Manufacturing Country: CAN

FSA Details**Vehicle Details**

Model Year:	2010	Assembly Plant:	OAKVILLE PLANT BUILD
Vehicle Line:	FORD EDGE/LINCOLN MKX	Production Date:	27-Jul-2009
Body Style Description:	4 DOOR WAGON	Warranty Start Date:	11-Aug-2009
Vehicle Type Description:	TRUCK	Sale Date:	11-Aug-2009
VDM Vehicle Status:	800	Engine Tag Code:	9G224BA
Emissions:			

Vehicle Conditions

Code	Vehicle Condition	Begin Date	End Date	Source
------	-------------------	------------	----------	--------

Owner Details**Current Owner**

Business Name:
 Owner Name: SUSAN ERWIN
 Address 1: 6715 RIVERSIDE DR
 Address 2:
 Address 3:
 Address 4:
 City: POWELL
 State/Province: Ohio Phone #:
 ZIP/Postal Code: 43065 7078 E-Mail:
 Country: UNITED STATES

Owner Effective Date: 09-Dec-2013 Vendor Applied Date: 18-Dec-2013
 Vendor Match Code Description: 4-NEITHER NAME OR ADDRESS MATC

N&A Source: POLK GCamp Applied Date: 21-Oct-2015
 Mail Status: Active Mail Suppression Date:

Fleet Code: Fleet Name:
 Fleet Status: Fleet Mgmt Code: -
 Company Car:

Historical Owner

Business Name: ENTERPRISE RENT-A-CAR 7CB515
 Owner Name:

Address 1:	3700 PARK 42 DR STE 100A		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	09-Apr-2010	Vendor Applied Date:	09-Apr-2010
Vendor Match Code Description:	-		
N&A Source:	WASFLEET	GCamp Applied Date:	16-Apr-2010
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:		Fleet Name:	
Fleet Status:		Fleet Mgmt:	-
Company Car:			
Historical Owner			
Business Name:	ENTERPRISE RENT-A-CAR 7CB515		
Owner Name:			
Address 1:	3700 PARK 42 DR STE 100A		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	09-Apr-2010	Vendor Applied Date:	09-Apr-2010
Vendor Match Code Description:	-		
N&A Source:	FLEET	GCamp Applied Date:	09-Apr-2010
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:	EL001	Fleet Name:	ENTERPRISE RENT-A-CAR
Fleet Status:	Y	Fleet Mgmt:	9999-ENTERPRISE RENT-A-CAR
Company Car:	NO		
Historical Owner			
Business Name:	ENTERPRISE RENT A CAR 7CB515		
Owner Name:			
Address 1:	3670 PARK 42 DR		
Address 2:			
Address 3:			
Address 4:			
City:	CINCINNATI		
State/Province:	Ohio	Phone #:	
ZIP/Postal Code:	45241	E-Mail:	
Country:	UNITED STATES		

Owner Effective Date:	14-Aug-2009	Vendor Applied Date:	14-Aug-2009
Vendor Match Code Description:	-		
N&A Source:	FLEET	GCamp Applied Date:	14-Aug-2009
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:	EL001	Fleet Name:	ENTERPRISE RENT-A-CAR
Fleet Status:	Y	Fleet Mgmt:	9999-ENTERPRISE RENT-A-CAR
Company Car:	NO		
Original Owner			
Business Name:	ENTERPRISE RENT A CAR		
Owner Name:			
Address 1:	600 CORPORATE PARK DR		
Address 2:			
Address 3:			
Address 4:			
City:	SAINT LOUIS		
State/Province:	Missouri	Phone #:	3145122256
ZIP/Postal Code:	63105	E-Mail:	
Country:	UNITED STATES		
Owner Effective Date:	11-Aug-2009	Vendor Applied Date:	11-Aug-2009
N&A Source:	NAVIS	GCamp Applied Date:	27-Feb-2013
Mail Status:	Active	Mail Suppression Date:	
Fleet Code:		Fleet Name:	
Fleet Status:		Fleet Mgmt Code:	-
Company Car:			

	P&A Code	GEO Sales	Sales Code	Sub Code	Description
Ordering	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.
Ship-To	43666	USA	F88648		EAN Holdings - Cincinnati
Stocking	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.
Selling	03733	USA	F72729		Marty Franich Ford Lincoln, Inc.

FSA Details

FSA Counts

FSA Category	Repair Eligible (Open)	Repair Ineligible (Closed)	Total
SAFETY RECALL	1	0	1
Total	1	0	1

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Pa

1994

tables*

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

For Personal Use Only



CARFAX® Vehicle History Report™

An independent company established in 1986

US \$39.99

Vehicle Information:
2010 FORD EDGE SEL
VIN: 2FMDK3JC2ABA19053
4 DOOR WAGON/SPORT UTILITY
3.5L V6 FI DOHC 24V
FRONT WHEEL DRIVE

 Accident / Damage reported

 **2** Previous owners

 At least 1 open recall


 **7** Service records available

 **36,813** Last reported odometer reading

 Worth **\$390** more than retail book value




This CARFAX Vehicle History Report is based only on information supplied to CARFAX and available as of 3/22/16 at 12:32:07 PM (EDT). Other information about this vehicle, including problems, may not have been reported to CARFAX. Use this report as one important tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.




Price Calculator™

Adjust the value of this 2010 Ford Edge Sel based on the information available in this report


1) Retail Book Value	2) CARFAX Price Adjustment™	3) Adjusted Retail Value
<div style="display: flex; align-items: center; justify-content: center;"> <div style="font-size: 2em; margin-right: 10px;">\$</div> <div style="font-size: 3em; margin-right: 10px;">0</div> </div> <p style="font-size: small; margin-top: 5px;">Enter retail book value here</p>	<div style="display: flex; align-items: center; justify-content: center;"> <div style="font-size: 2em; margin-right: 10px;">+</div> <div style="font-size: 2em; margin-right: 10px;">\$390</div> </div> <p style="font-size: small; margin-top: 5px;">Above retail book value</p>	<p style="font-size: small; margin-top: 10px;">Begin by entering the retail book value</p>



Start by entering the retail book value from a pricing guide website.



This vehicle is worth more than average, based on information in this report.



Compare adjusted retail value to seller's asking price when making your decision.

CARFAX Ownership History		
The number of owners is estimated		
	Owner 1	Owner 2
Year purchased	2009	2010
Type of owner	Rental	Personal
Estimated length of ownership	7 months	5 yrs. 7 mo.
Owned in the following states/provinces	Ohio	Ohio
Estimated miles driven per year	---	4,950/yr
Last reported odometer reading	20,693	36,813



<https://www.carfax.com/api/consumers/694618/report/email/8d5d754f2b8c>


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1/6

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

 Title History CARFAX guarantees the information in this section	Owner 1	Owner 2
Salvage Junk Rebuilt Fire Flood Hail Lemon	Guaranteed No Problem	Guaranteed No Problem
Not Actual Mileage Exceeds Mechanical Limits	Guaranteed No Problem	Guaranteed No Problem
 GUARANTEED - None of these major title problems were reported by a state Department of Motor Vehicles (DMV). If you find that any of these title problems were reported by a DMV and not included in this report, CARFAX will buy this vehicle back. Register View Terms View Certificate		

 Additional History Not all accidents / issues are reported to CARFAX	Owner 1	Owner 2
Total Loss No total loss reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported	<input checked="" type="checkbox"/> No Issues Reported
Structural Damage No structural damage reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported	<input checked="" type="checkbox"/> No Issues Reported
Airbag Deployment No airbag deployment reported to CARFAX.	<input checked="" type="checkbox"/> No Issues Reported	<input checked="" type="checkbox"/> No Issues Reported
Odometer Check No indication of an odometer rollback.	<input checked="" type="checkbox"/> No Issues Indicated	<input checked="" type="checkbox"/> No Issues Indicated
Accident / Damage Accident reported on 03/07/2014.	<input checked="" type="checkbox"/> No Issues Reported	<input type="checkbox"/> Accident Reported
Manufacturer Recall At least 1 manufacturer recall requires service. Locate an authorized Ford or Lincoln Mercury dealer or call 866-436-7332 to obtain more information about this recall.	<input checked="" type="checkbox"/> No Recalls Reported	<input type="checkbox"/> Recall Reported
Basic Warranty Original warranty estimated to have expired. Interested in an extended warranty ?	Warranty Expired	Warranty Expired

Tell us what you know about this vehicle

View other FORD EDGE SEL vehicles with FREE CARFAX Reports



2011 Ford Edge
\$17,988
46,212 miles



2010 Ford Edge
\$16,477
68,691 miles




2011 Ford Edge
\$19,990
69,318 miles



2010 Ford Edge
\$15,898
69,564 miles

[See more cars](#)

 Detailed History	Glossary			
Owner 1 Purchased: 2009 Type: Rental	Date: 07/29/2009	Mileage: 	Source: NICB	Comments: Vehicle manufactured


<https://www.carfax.com/api/consumers/694618/report/email/8d5d754f2b8d63a55e3c187ec1571cbff6d65748f66cd879a899fee4102235c31c4d40b4ebe2134>

2/6

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

Where: Est. length owned:	Ohio 8/17/09 - 3/30/10 (7 months)				and shipped to original dealer
		08/17/2009	10	Ohio Motor Vehicle Dept. Tulsa, OK Title #1301701085	Title issued or updated First owner reported Titled or registered as rental vehicle
		09/02/2009		Ohio Motor Vehicle Dept. Cincinnati, OH Title #1301701085	Registration issued or renewed
		02/18/2010		Ohio Motor Vehicle Dept. Cincinnati, OH Title #1301701085	Registration issued or renewed
		03/30/2010	20,693	Fleet/Lease Company	Vehicle sold
		03/31/2010		Buckeye Ford Lincoln Sidney, OH 937-498-4014 buckeyefordsidney.co m	Pre-delivery inspection completed Tire(s) balanced Tires rotated Alignment checked Oil and filter changed Wiper(s) replaced Anti-theft/keyless system checked Four tires balanced Alignment performed Front license plate bracket installed/replaced
		04/02/2010		Online Listing	Vehicle offered for sale
		04/05/2010		Ohio Motor Vehicle Dept.	Vehicle purchase reported
		04/07/2010		Ohio Motor Vehicle Dept. Sidney, OH Title #7500356467	Title issued or updated Dealer took title of this vehicle while it was in inventory

Owner 2		Date:	Mileage:	Source:	Comments:
Purchased:	2010	07/24/2010	21,772	Ohio Motor Vehicle Dept.	Vehicle purchase reported
Type:	Personal				
Where:	Ohio	07/28/2010		Buckeye Ford Lincoln Mercury Sidney, OH 937-498-4014 buckeyeford.com	Vehicle sold
Est. miles/year:	4,950/yr				
Est. length owned:	7/24/10 - present (5 yrs. 7 mo.)	07/30/2010		Ohio Motor Vehicle Dept. Powell, OH Title #7500362370	Title issued or updated Registration issued or renewed New owner reported
Low mileage! This owner drove less than the industry average of 15,000 miles per year. 		12/20/2010	22,238	Byers Ford of Delaware Delaware, OH 740-363-3673 byersford.com	Maintenance inspection completed Battery/charging system checked Tire condition and pressure checked Spare tire cover installed New key(s) cut Brakes checked
		03/08/2011	25,877	Byers Ford of Delaware Delaware, OH 740-363-3673 byersford.com	Maintenance inspection completed Battery/charging system checked Brakes checked Fluids checked Oil and filter changed Tires rotated Tire condition and pressure checked Wiper(s) replaced
		05/10/2011	26,491	Byers Ford of Delaware Delaware, OH 740-363-3673	Maintenance inspection completed Battery/charging system checked Brakes checked Tire condition and pressure checked

<https://www.carfax.com/api/consumers/694618/report/email/8d5d754f2b8d63a55e3c187ec1571cbff6d65748f6cd879a899fee4102235c31c4d40b4ebe2134>

3/6

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

		byersford.com	Emblem replaced
12/09/2011		Ohio Motor Vehicle Dept. Powell, OH Title #7500362370	Registration issued or renewed
03/16/2012	30,765	Byers Ford of Delaware Delaware, OH 740-363-3673 byersford.com	Maintenance inspection completed Battery/charging system checked Brakes checked Fluids checked Oil and filter changed Tires rotated Tire condition and pressure checked Air filter replaced
12/19/2012	32,567	Byers Ford of Delaware Delaware, OH 740-363-3673 byersford.com	Maintenance inspection completed Brakes checked Battery/charging system checked Fluids checked Oil and filter changed Tires rotated Tire condition and pressure checked
08/06/2013	36,813	Byers Ford of Delaware Delaware, OH 740-363-3673 byersford.com	Maintenance inspection completed Battery/charging system checked Brakes checked Fluids checked Oil and filter changed Tires rotated Tire condition and pressure checked
12/09/2013		Ohio Motor Vehicle Dept. Powell, OH Title #7500362370	Registration issued or renewed
03/07/2014		Florida Damage Report	Accident reported Involving left front impact with another motor vehicle Left front primarily damaged Disabling damage reported Vehicle towed Airbags did not deploy
			Click here to get this accident report
10/27/2015		Ford Motor Company	Manufacturer Safety recall issued Recall #15S31 FUEL TANK CORROSION INSPECTION AND REPAIR
			Locate an authorized Ford or Lincoln Mercury dealer or call 866-436-7332 to obtain more information about this recall
Print this CARFAX Report and take it to your pre-purchase inspection			

Tell us what you know about this vehicle

Have Questions? Please visit our Help Center at www.carfax.com.

Glossary

[View Full Glossary](#)**Accident / Damage Indicator**

CARFAX receives information about accidents in all 50 states, the District of Columbia and Canada. Different information in a vehicle's history can indicate an accident or damage, such as: salvage auction, fire damage, police-reported accident, crash test vehicle, damage disclosure, collision repair facility and automotive recycler records. Not every accident or damage event is reported and not all reported are provided to CARFAX. Details about the accident or damage event when reported to CARFAX (e.g. severity, impact location, airbag deployment) are included on the Vehicle History Report. CARFAX recommends you obtain a vehicle inspection from

3/22/2016

CARFAX Vehicle History Report for this 2010 FORD EDGE SEL: 2FMDK3JC2ABA19053

your dealer or an independent mechanic.

- According to the National Safety Council, Injury Facts, 2015 edition, 8% of the 254 million registered vehicles in the U.S. were involved in an accident in 2013. Over 74% of these were considered minor or moderate.
- CARFAX depends on many sources for its accident / damage data. CARFAX can only report what is in our database on 3/22/16 at 12:32:07 PM (EDT). New data will result in a change to this report.

Florida Damage Reports:

- Provide an estimate of the extent of damage in its accident reports for the following:
 - SEVERE/TOTALED: The vehicle cannot be driven from the accident scene due to severe damage or an injury. This level of damage often results in a Salvage or Junk title.
 - DISABLED: The vehicle had to be towed or hauled away from the accident location.
 - FUNCTIONAL: The vehicle could be driven from the accident location.
 - MODERATE: The accident damage affects the operation of the vehicle and/or its parts. Examples include broken windows, trunk lids, doors, bumpers and tires.
 - MINOR: The accident damage does not affect the operation of the vehicle. Examples include dented bumpers, fenders, grills and body panels. This level of accident should not compromise vehicle safety.
 - NO DAMAGE: The vehicle was not damaged.
- Are required if the estimated damage exceeds \$500

CARFAX Price Adjustment™

Accidents, service records, number of owners and many other history factors can affect a vehicle's value. The CARFAX Price Adjustment is a tool that analyzes millions of used car transactions to measure how the combination of all the information reported to CARFAX affects the value of a particular vehicle. The vehicle's retail book value plus the CARFAX Price Adjustment will give you a more accurate measure of the vehicle's value. Use this tool, along with a vehicle inspection and test drive, to make a better decision about your next used car.

First Owner

When the first owner(s) obtains a title from a Department of Motor Vehicles as proof of ownership.

Ford or Lincoln Mercury Recall

The Ford Motor Company provides Carfax with recall information regarding safety, compliance and emissions programs announced since 2000 for a specific vehicle. For complete information regarding programs or concerns about this vehicle, please contact a local Ford or Lincoln Mercury Dealer.

Manufacturer Recall

Automobile manufacturers issue recall notices to inform owners of car defects that have come to the manufacturer's attention. Recalls also suggest improvements that can be made to improve the safety of a particular vehicle. Most manufacturer recalls can be repaired at no cost to you.

New Owner Reported

When a vehicle is sold to a new owner, the Title must be transferred to the new owner(s) at a Department of Motor Vehicles.

Ownership History

CARFAX defines an owner as an individual or business that possesses and uses a vehicle. Not all title transactions represent changes in ownership. To provide estimated number of owners, CARFAX proprietary technology analyzes all the events in a vehicle history. Estimated ownership is available for vehicles manufactured after 1991 and titled solely in the US including Puerto Rico. Dealers sometimes opt to take ownership of a vehicle and are required to in the following states: Maine, Massachusetts, New Jersey, Ohio, Oklahoma, Pennsylvania and South Dakota. Please consider this as you review a vehicle's estimated ownership history.

Rental

Vehicle was registered by a rental agency.

Title Issued

A state issues a title to provide a vehicle owner with proof of ownership. Each title has a unique number. Each title or registration record on a CARFAX report does not necessarily indicate a change in ownership. In Canada, a registration and bill of sale are used as proof of ownership.

Follow Us:  facebook.com/CARFAX  @CarfaxReports  CARFAX on Google+

CARFAX DEPENDS ON ITS SOURCES FOR THE ACCURACY AND RELIABILITY OF ITS INFORMATION. THEREFORE, NO RESPONSIBILITY IS ASSUMED BY CARFAX OR ITS AGENTS FOR ERRORS OR OMISSIONS IN THIS REPORT. CARFAX FURTHER EXPRESSLY DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. CARFAX®

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIRCUIT CIVIL DIVISION

Dennis Erwin, Indiv.; Dennis Erwin,
As Executor of Estate of Susan Erwin
Plaintiff(s)

Case No.: **16-CA-002032**

vs

Ford Motor Company; Albert Mcclinton
Defendant(s)

Division F

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant(s)

Albert Mcclinton
4346 Huddleston Drive
Wesley Chapel, FL 33545-5234

Each defendant is required to serve written defenses to the complaint or petition on RAYMOND O BODIFORD, plaintiff's attorney, whose address is **BODIFORD LAW GROUP 121 S ORANGE AVE STE 1150 ORLANDO FL 32801** within 20¹ days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on March 14, 2016.

Attorney: RAYMOND O BODIFORD

Attorney For: Dennis Erwin

Address: BODIFORD LAW GROUP

121 S ORANGE AVE STE 1150

ORLANDO FL 32801

Florida Bar No: 327840

PAT FRANK

As Clerk of the Court





Dana Caranante, Deputy Clerk

Prepared By: Kim Dietz, Deputy Clerk

P.O. Box 989

800 E Twiggs St

Tampa, FL 33601

Room 101

Tampa FL 33602

(813)276-8100 extension 4365

¹ Except when suit is brought pursuant to section 768.28, Florida Statutes, if the State of Florida, one of its agencies, or one of its officials or employees sued in his or her official capacity is a defendant, the time to be inserted as to it is 40 days. When suit is brought pursuant to section 768.28, Florida Statutes, the time to be inserted is 30 days.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Hillsborough County Courthouse, 800 E. Twiggs St., Room 604, Tampa, Florida 33602, (813) 272-7040, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

Florida Rules of Civil Procedure Form 1.902(a), Summons (06/10)

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named in the documents.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jours consecutifs a partir de la date de l'assignation de cette citation pour déposer une reponse ecrite a la plainte ci-jointe aupres de ce tribunal. Un simple coup de telephone est insuffisant pour vous proteger. Vous etes obliges de déposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de déposer vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou a son avocat) nomme ci-dessous.

Filing # 38898383 E-Filed 03/11/2016 10:12:55 AM

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL
CIRCUIT OF THE STATE OF FLORIDA, IN AND FOR HILLSBOROUGH COUNTY
CIRCUIT CIVIL DIVISION

Dennis Erwin, Indiv. and as Executor of Estate

Plaintiff(s)

CASE NO.: 16-CA-002032

VS.

DIVISION: F

Ford Motor Company and Albert McClinton

Defendant(s)

REQUEST FOR ISSUANCE OF SUMMONS -CIRCUIT CIVIL

This is a request for issuance of service of process by the Clerk of court as follows:

*PLEASE NOTE THAT A SEPARATE REQUEST
IS REQUIRED FOR EACH PARTY TO BE SERVED*

Type of Process: (choose one)
<input checked="" type="checkbox"/> Initial Summons <input type="checkbox"/> Alias Summons <input type="checkbox"/> Pluries Summons
Type of Summons: (choose one)
Circuit Court Summons: Indicate days to respond <input checked="" type="checkbox"/> 20 <input type="checkbox"/> 30 <input type="checkbox"/> 45 <input type="checkbox"/> 60 <input type="checkbox"/> Other ____ Non-Residential Eviction: <input type="checkbox"/> Mailing <input type="checkbox"/> No Mailing Residential Eviction - <input type="checkbox"/> 5 day only <input type="checkbox"/> 5 day with 20 day attached <input type="checkbox"/> Mailing <input checked="" type="checkbox"/> No Mailing
Party information:
Party To Be Served: Name: ALBERT MCCLINTON Address: 4346 HUDDLESTON DRIVE City/State/Zip: WESLEY CHAPEL, FL 33545-5234 Email Address to Return Issued Summons: jennifer@bodifordlawgroup.com

Filing # 38518725 E-Filed 03/02/2016 03:08:58 PM

IN THE THIRTEENTH JUDICIAL CIRCUIT OF THE
STATE OF FLORIDA, IN AND FOR HILLSBOROUGH COUNTY

Dennis Erwin, Indiv and as Executor

of Estate of Susan Erwin, deceased

Plaintiff/Petitioner(s)

CASE NO.: _____

DIVISION: _____

vs.

Ford Motor Company and

Albert McClinton, individually

Defendant/Respondent(s)

REQUEST FOR DIVISION ASSIGNMENT

This is a request based on local Administrative Order(s) for the Clerk of the Court to assign the above styled case in the:

☒ Tampa Division

☐ East Division

☐ Prior Division (Please indicate Case Number and Division of previously filed action: _____)

I understand that the actual division assignment will be in accordance with the Hillsborough County Administrative Orders. If there is no supported request for specific division assignment, this action will be assigned a division based on a random and equitable distribution system.

Name of Attorney: Raymond O. Bodiford

Address: 121 South Orange Ave., Suite 1150

Orlando, FL 32801

Phone Number: 407-423-9728

Email Address(es): jennifer@bodifordlawgroup.com & lawyers3@aol.com

Filing # 38518725 E-Filed 03/02/2016 03:08:58 PM

CIVIL COVER SHEET

Form 1.997 The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form shall be filed by the plaintiff or petitioner for the use of the Clerk of Court for the purpose of reporting judicial workload data pursuant to Florida Statute section 25.075. (See instructions for completion.)

I. CASE STYLE

In the Circuit Court of the Thirteenth Judicial Circuit for Hillsborough County, Florida

Dennis Erwin, Individually and as Executor
of the Estate of Susan Erwin, deceased

Plaintiff(s),

Case #: _____

Division: _____

vs.

Ford Motor Company and
Albert McClinton, Individually

Defendant(s).

THIS CASE IS APPROPRIATE FOR ASSIGNMENT TO THE BUSINESS COURT ☐

Please See Attached Business Court Addendum Form

III. REMEDIES SOUGHT (Check all that apply):

- ☒ Monetary;
☐ Non-monetary declaratory or injunctive relief;
☐ Punitive

IV. NUMBER OF CAUSES OF ACTION: [☒]

(Specify) (5) Strict Liability, Negligence, Negligent Infliction, Personal Jurisdiction

V. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ Yes
☒ No

VI. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ No
☐ Yes If "yes", list all related cases by name, case number and court.

VII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ Yes
☐ No

VIII. IS TRIAL EXPECTED TO LAST MORE THAN TEN (10) TRIAL DAYS (2 WEEKS)?

- ☐ Yes
☒ No

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief.

Signature



Attorney or Party

Raymond O. Bodiford

Type or Print Name

FL Bar # 327840

(Bar # if attorney)

March 2, 2016

Date

BUSINESS COURT ADDENDUM

Party or Attorney Filing Action Must Place an "X" in One of the Boxes Below

The categories of cases set out below shall guide the parties and the Court in the designation of cases for the Business Court.

- ☐ A. Internal affairs or governance; dissolution or liquidation rights; obligations between or among owners (shareholders, partners, members); or liability or indemnity of managers (officers, directors, managers, trustees, or members or partners functioning as managers) of corporations, partnerships, limited partnerships, limited liability companies or partnerships;
- ☐ B. Trade secrets and non-compete agreements;
- ☐ C. Intellectual property;
- ☐ D. Securities or state securities laws;
- ☐ E. Antitrust statutes;
- ☐ F. Shareholder derivative actions and related class actions;
- ☐ G. Corporate trust affairs or director and officer liability;
- ☐ H. Non-consumer UCC-related transactions;
- ☐ I. Purchases and sales of businesses or the assets of a business; and
- ☐ J. Franchisee/franchisor relationships and liabilities

NOTE: A copy of the Civil Cover Sheet and this Addendum must be served with the Complaint for all Business Court cases. See Administrative Order S-2013-021 for further Business Court requirements.



II. TYPE OF CASE: (If a case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an X in both the main category and the subcategory boxes.

- | | |
|---|--|
| <input type="checkbox"/> Condominium | <input type="checkbox"/> Real property / Mortgage foreclosure (cont.) |
| <input type="checkbox"/> Contracts and indebtedness | <input type="checkbox"/> Other real property actions \$0-\$50,000 |
| <input type="checkbox"/> Eminent domain | <input type="checkbox"/> Other real property actions \$50,001-\$249,999 |
| <input type="checkbox"/> Auto Negligence | <input type="checkbox"/> Other real property actions \$250,000 or more |
| <input type="checkbox"/> Negligence-other | <input type="checkbox"/> Professional malpractice |
| <input type="checkbox"/> Business governance | <input type="checkbox"/> Malpractice - Business |
| <input type="checkbox"/> Business torts | <input type="checkbox"/> Malpractice - Medical |
| <input type="checkbox"/> Environmental/Toxic tort | <input type="checkbox"/> Malpractice - other professional |
| <input type="checkbox"/> Third party indemnification | <input type="checkbox"/> Other |
| <input type="checkbox"/> Construction defect | <input type="checkbox"/> Antitrust / trade regulation |
| <input type="checkbox"/> Mass tort | <input type="checkbox"/> Business transactions |
| <input type="checkbox"/> Negligent security | <input type="checkbox"/> Constitutional challenge – statute or ordinance |
| <input type="checkbox"/> Nursing home negligence | <input type="checkbox"/> Constitutional challenge – proposed amendment |
| <input type="checkbox"/> Premises liability – commercial | <input type="checkbox"/> Corporate trusts |
| <input type="checkbox"/> Premises liability – residential | <input type="checkbox"/> Discrimination – employment or other |
| <input checked="" type="checkbox"/> Products liability | <input type="checkbox"/> Insurance claims |
| <input type="checkbox"/> Real property / Mortgage foreclosure | <input type="checkbox"/> Intellectual property |
| <input type="checkbox"/> Commercial foreclosure \$0-\$50,000 | <input type="checkbox"/> Libel / Slander |
| <input type="checkbox"/> Commercial foreclosure \$50,001-\$249,999 | <input type="checkbox"/> Shareholder derivative action |
| <input type="checkbox"/> Commercial foreclosure \$250,000 or more | <input type="checkbox"/> Securities litigation |
| <input type="checkbox"/> Commercial foreclosure \$50,001 - \$249,999 | <input type="checkbox"/> Trade secrets |
| <input type="checkbox"/> Homestead residential foreclosure \$0-\$50,000 | <input type="checkbox"/> Trust litigation |
| <input type="checkbox"/> Homestead residential foreclosure \$50,001-\$249,999 | |
| <input type="checkbox"/> Homestead residential foreclosure \$250,000 or more | |
| <input type="checkbox"/> Nonhomestead residential \$0-\$50,000 | |
| <input type="checkbox"/> Nonhomestead residential \$50,001-\$249,999 | |
| <input type="checkbox"/> Nonhomestead residential \$250,000 or more | |



**Service of Process
Transmittal**

03/14/2016

CT Log Number 528808065

TO: Chris Dzbanski
Ford Motor Company
1 American Rd, Whq 421-E6
Dearborn, MI 48126-2798

RE: Process Served in Florida

FOR: Ford Motor Company (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: DENNIS ERWIN, Individually and as Executor of the Estate of SUSAN ERWIN, deceased, Pltf. vs. FORD MOTOR COMPANY and ALBERT MCCLINTON, etc., Dft.

DOCUMENT(S) SERVED: Summons, Attachment(s), Complaint

COURT/AGENCY: Hillsborough County Circuit Court, FL
Case # 16CA002032

NATURE OF ACTION: Product Liability Litigation - Manufacturing Defect - 2010 Ford Edge - VIN: 2FMDK3JC2ABA19053

ON WHOM PROCESS WAS SERVED: C T Corporation System, Plantation, FL

DATE AND HOUR OF SERVICE: By Process Server on 03/14/2016 at 13:30

JURISDICTION SERVED : Florida

APPEARANCE OR ANSWER DUE: Within 20 days after service of this summons on that defendant, exclusive of the day of service

ATTORNEY(S) / SENDER(S): Raymond O. Bodiford
Bodiford Law Group
121 S. Orange Ave., Suite 1150
Orlando, FL 32801
(401) 423-9728

ACTION ITEMS: CT has retained the current log, Retain Date: 03/14/2016, Expected Purge Date: 03/19/2016

Image SOP

Email Notification, Chris Dzbanski cdzbansk@ford.com

Email Notification, Mary Ann MacKinnon mmackin1@ford.com

SIGNED:
ADDRESS: C T Corporation System
1200 South Pine Island Road
Plantation, FL 33324
TELEPHONE: 954-473-5503

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIRCUIT CIVIL DIVISION

Dennis Erwin, Individ.; Dennis Erwin,
as Executor of Estate of Susan Erwin
Plaintiff(s)
vs

Case No.: 16-CA-002032

Ford Motor Company; Albert McClinton
Defendant(s)

Division F

DATE: 3-14-16 TIME: 1:30 PM

SUMMONS

ERIC DEAL

S.P.S. #336

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant(s)

Ford Motor Company

1200 South Pine Island Road
Plantation FL 33324

Each defendant is required to serve written defenses to the complaint or petition on RAYMOND O BODIFORD, plaintiff's attorney, whose address is BODIFORD LAW GROUP 121 S ORANGE AVE STE 1150 ORLANDO FL 32801 within 20¹ days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on March 14, 2016.

Attorney: RAYMOND O BODIFORD

Attorney For: Dennis Erwin

Address: BODIFORD LAW GROUP

121 S ORANGE AVE STE 1150

ORLANDO FL 32801

Florida Bar No: 327840

PAT FRANK

As Clerk of the Court

Dana Caranante



Dana Caranante, Deputy Clerk

Prepared By: Kim Dietz, Deputy Clerk

P.O. Box 989

800 E Twiggs St

Tampa, FL 33601

Room 101

Tampa FL 33602

(813)276-8100 extension 4365

¹ Except when suit is brought pursuant to section 768.28, Florida Statutes, if the State of Florida, one of its agencies, or one of its officials or employees sued in his or her official capacity is a defendant, the time to be inserted as to it is 40 days. When suit is brought pursuant to section 768.28, Florida Statutes, the time to be inserted is 30 days.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Hillsborough County Courthouse, 800 E. Twiggs St., Room 604, Tampa, Florida 33602, (813) 272-7040, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

Florida Rules of Civil Procedure Form 1.902(a), Summons (06/10)

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named in the documents.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiere perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.